

Dec. 8, 2004

BLM Wind Energy Programmatic EIS
Argonne National Laboratory
EAD/900 (Attn: Mr. Lee Otteni)
9700 S. Cass Avenue
Argonne, IL, 60439

Dear Mr. Otteni:

The U.S. Environmental Protection Agency (EPA) has reviewed the Bureau of Land Management's (BLM) **Programmatic Draft Environmental Impact Statement (DEIS) on Wind Energy Development on BLM-Administered Lands in the Western United States** pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

EPA supports increasing the development of renewable energy resources, as recommended in the National Energy Policy. The Programmatic DEIS is a comprehensive document that provides background on the issues, discusses the current process for developing wind energy projects, identifies the four stages of implementing wind projects and outlines the expected growth of our energy needs in the next 20 years. The document analyzes the environmental, social, and economic impacts associated with three alternatives, (No Action, Limited Development, and Comprehensive Development [preferred alternative]). The DEIS alternatives address most direct and indirect impacts, and suggest mitigation at the programmatic level. However, the final EIS should discuss impacts associated with the construction of new or modified infrastructure to connect wind generated energy to the general electric grid. In particular, EPA has concerns with the potential impacts from these actions on wetlands, water quality and wildlife habitat. The final EIS should include best management practices (BMPs) and mitigation measures in addition to information to address these concerns.

EPA supports the Proposed Policies in section 2.2.3.1, Proposed BMPs in section 2.2.3.2, and Mitigation Measures in section 5, and considers the framework outlined under the Proposed Action Alternative to be appropriate at the programmatic level. While the document states that "compliance with the CWA and BLM restrictions regarding activities in wetlands on BLM-administered lands would limit the likelihood of construction occurring in wetland habitats," there is no mention of the Section 404 regulatory requirements. The final EIS should reference

Clean Water Act requirements, and reflect that site-specific actions will have to comply with Sections 404 of the Clean Water Act.

The DEIS proposes voluntary bonding or financial assurance for decommissioning and reclamation. Based on the potential risks identified in the DEIS, we suggest that BLM consider requiring bonding for these activities. The expected life span of these projects, which we did not find discussed in the DEIS, would be useful in determining the correct financial instruments that could be used for bond calculations.

Portions of the eleven states covered by this programmatic DEIS have been designated as non-attainment areas for Particulate Matter (PM10). The final EIS should clarify that individual projects proposed in these areas must be in conformance with state air quality implementation plans (SIPs).

In accordance with EPA policy we have rated the document EC-2 (Environmental Concerns - Insufficient Information). The rating reflects EPA's concerns about the potential for impacts to aquatic resources, water quality and wildlife habitat. The 2 portion of the rating is based on the request for additional information on infrastructure impacts and on conformity. A copy of EPA's rating criteria is attached.

EPA appreciates the opportunity to review this DEIS, and is willing to work with BLM should you wish to discuss these issues further. If you have any questions, please call me at 202/564-5400 or have your staff contact Elaine Suriano at 202/564-7162.

Sincerely,

/s/

Anne Norton Miller
Director
Office of Federal Activities